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SOUTHERN NATURAL GAS

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RSPA-98-4868-2

November 13, 1991

Research and Special Programs Administration
U. S. Department of Transportation
400 Seventh Street, S.W.
Washington' D.C. 20590

Attention: Dockets Unit, Room 8417

Re: Gas Gathering Line Definition;
Docket No. PS-122, Notice 1;
Proposed 9-25-91 in the Federal Register

Southern Natural Gas Company ("Southern"), a natural gas company within the meaning of the Natural Gas Act, is engaged in the purchase, sale and transportation of natural gas and the operation of an interstate pipeline system serving the southeastern United States. As the owner and operator of over 8,000 miles of gas gathering and transmission pipelines, Southern will be significantly affected by the above-referenced Notice of Proposed Rulemaking (the "Rulemaking"), particularly with respect to the definition of "gas gathering line" proposed therein. Southern appreciates the opportunity to submit the following comments to the Research and Special Programs Administration (the "RSPA") regarding this proposed definition.

Southern opposes the portion of the Rulemaking containing a revision of the definition of the term "gas gathering line". For the reasons described in this letter, Southern submits that this provision of the Rulemaking should be withdrawn.

It appears to Southern that there is no legitimate pipeline safety reason for the proposed definitional change. The Rulemaking does not establish pipeline safety as a basis for the need for the change. Indeed, it appears that the proposed definitional change might actually reduce pipeline safety as the pipeline operator, in response to burdens imposed by the Rulemaking, would be forced to divert

economic and human resources from pipelines located in populated geographical areas to pipelines located in areas remote to human habitation.

Furthermore, the proposed change in the definition of gas gathering facility would conflict with the provision of the Natural Gas Pipeline Safety Act that clearly excludes remote gathering lines from Federal pipeline safety jurisdiction. Through reclassification as a transmission pipeline, the remote gathering line would be made subject to the requirements of 49 C.F.R., Part 192.

Two statements in the Rulemaking are particularly troublesome. Southern is concerned that the provisions of 49 C.F.R., Part 192 do not support the Rulemaking's statement that reclassified transmission lines would only be subject to the operating and maintenance requirements of Part 192. In addition, the Rulemaking's statement that the RSPA would assist the pipeline operator in overcoming any problems encountered in complying with the Part 192 regulations appears to be too vague to contain any real meaning. Much more description, support, and explanation is needed in regard to both these statements.

Southern is also concerned that the Rulemaking does not adequately describe its large impact upon both the transmission operator and the natural gas consumer. The conversion and establishment of the MAOP of each of the numerous remote gathering lines that will have to be reclassified as transmission lines under the Rulemaking in order to comply with 49 C.F.R., Part 192 will be an expensive undertaking, the costs of which will ultimately be borne by the consumer. In addition, there will be increased operation and maintenance costs to satisfy code requirements, and increased user fees that must be paid for each mile of pipeline reclassified as transmission.


Southern concludes that the RSPA should carefully consider the impact of the Rulemaking upon pipeline operators and consumers. A trend seems to be developing for the RSPA to emphasize goals that are income-producing rather than safety-oriented. The proposed change of the definition of a gas gathering line exemplifies this trend. For this reason and the reasons discussed above,

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Southern urges the RSPA to withdraw the proposed change of the definition of a gas gathering line. The proposed changes do not appear to be in the best interest of either the pipeline industry or the gas consumers.

Very truly yours,

SOUTHERN NATURAL GAS COMPANY

BY 

Charles S. Farrell
Supervisor, Pipeline
Code and Safety Regulations